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December 27, 2022

VIA ECF

Hon. Pamela K. Chen
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: SEC v. Xia, et al., No. 21-cv-05350-PKC-RER

Dear Judge Chen:

We write on behalf of Defendants, Richard Xia and Fleet, and Relief Defendant Yue. We understand that Relief Defendants Xi Verfenstein and Xinming Yu have written to the Court to request a 30-day adjournment to retain new counsel to represent them in the above-referenced matter. Please be advised that Defendants and Ms. Yue have no opposition to their request for an adjournment. Defendants and Ms. Yue also have proposed to the SEC that all depositions should be adjourned until Relief Defendants Verfenstein and Yu retain new counsel so that the currently-scheduled depositions need not be repeated.

Thank you in advance for Your Honor's kind consideration. We are, as always, available to answer any questions Your Honor may have.

Respectfully yours,


Mark C. Rifkin
For the Firm

cc: All Counsel (via ECF)